

## INTRODUCTION

Although Signpost is an independent charity, it has partnered with One YMCA and has signed up to this One YMCA Privacy / Data Protection policy. It is sharing the processes and other key staff referred to in this policy (such as the Data Protection Manager) where relevant.

Because this is a One YMCA policy, not everything contained in it will be directly relevant to Signpost or its clients (eg housing) and some of the contact details will be for YMCA staff instead of Signpost. If you have any specific queries, please refer to the Signpost Manager.

1. This Policy covers One YMCA, Early Childhood Partnership and subsidiary charities and projects ('Charity', 'We', 'Our'). The Charity is committed to protecting and respecting your privacy. Each legal entity is registered with the Information Commissioner for data protection purposes.
2. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, the Charity acts as:
  - 2.1. Data Controller – where we determine the purposes and means of processing personal data, and
  - 2.2. Data Processor – where we process personal data on behalf of the Data Controller.
3. Our position varies on whether we are a Data Controller or Data Processor and is dependent upon whether we are directly responsible for service design and delivery, or where we are carrying out or have been commissioned to work on behalf of others. For further information, please contact the Manager of the service you are using or the Data Protection Officer.
4. We work with trusted third party organisations in some areas of our work where partnerships and data sharing protocols are in place. This includes:
  - 4.1. Herts Young Homeless,
  - 4.2. Families First Bedfordshire,
  - 4.3. FACES Bedford,
  - 4.4. Peter Pan Teaching School Alliance.
5. This Policy sets out the use of the information you give us, why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.
6. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check our data protection page ([www.oneymca.org/data](http://www.oneymca.org/data)) occasionally to make sure you are happy with any changes.
7. If you have any questions about this Policy or concerning your personal information please contact the Data Protection Officer who can be contacted at [data.protection@oneymca.org](mailto:data.protection@oneymca.org) or by post to Data Protection Officer, One YMCA, Charter House, Charter Place, Watford, Hertfordshire WD17 2RT.

## **WHAT TYPE OF PERSONAL INFORMATION WE COLLECT**

8. The type and amount of information we collect depends on why you are providing it. The Charity operates a wide range of services and the information that you provide will depend upon the services that you require.
9. The information we collect when you make an enquiry includes your name and details beyond that depend upon the specific services that you are seeking. Please consult any application forms for further information. Please note that different services will require differing levels of information so that we can determine whether the Charity is best placed to help you.
10. If you are a supporter, for example making a donation, volunteering, registering to fundraise, signing up for an event in addition to asking for your name and contact details (your full address, email address and your phone number), we may also ask you for service specific information that assists the Charity deliver its services and needs of beneficiaries.
11. If you are a donor, any payment details that you provide will be in the form of:
  - 11.1. Payments via a Just Giving portal and the Charity will not receive credit card details as these are processed securely by Just Giving,
  - 11.2. Payments via BACS and the Charity will receive bank transaction details.
12. If you are a service or job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our consideration of your application.
13. If you sign up for an event operated by the Charity, then the information you provide to register your booking will be held by the Charity. However, any payments will be dealt with by the booking portal with is operated securely by a third party and the Charity will not receive credit card details.

## **HOW WE COLLECT INFORMATION**

14. We may collect information from you whenever you contact us or have any involvement with us, for example when you:
  - 14.1. visit our website (see our Cookies policy set out at [www.oneymca.org/data](http://www.oneymca.org/data)),
  - 14.2. donate to us or fundraise for us,
  - 14.3. enquire about our activities or services,
  - 14.4. apply to receive the Charity's services,
  - 14.5. apply to receive accommodation from us,
  - 14.6. request housing advice and support from us,
  - 14.7. enter into a gym contract,
  - 14.8. request a fitness class place where you provide fitness information about yourself,
  - 14.9. enter into a nursery contract or place your child into our care,
  - 14.10. enter into a community centre booking contract,
  - 14.11. let or hire space from us,
  - 14.12. register for children's or family centre services and/or activities,
  - 14.13. participate or visit children's or family centres,
  - 14.14. join (or your child joins) a youth club,
  - 14.15. sign up to receive news about our activities,
  - 14.16. create or update a profile,
  - 14.17. post content onto our website/social media sites,

- 14.18. volunteer for us,
- 14.19. attend a meeting with us and provide us with information,
- 14.20. take part in our events,
- 14.21. enter our buildings which are subject to CCTV systems which are present for the prevention of crime, anti-social behaviour and/or good site management or security purposes,
- 14.22. contact us in any way including online, email, phone, SMS, social media or post.

## WHERE WE COLLECT INFORMATION FROM

### 15. We collect information:

- 15.1. From you when you give it to us directly: You may provide your details when you ask us for help or apply to access a Charity service. Your information may be collected by an organisation we are working with (such as a partner organisation) but we are still responsible for your information.
- 15.2. From you when you give it to us directly in respect of a service that we have been commissioned to deliver: You may provide your details when you ask us for help or apply to access a commissioned service that we are involved in its delivery. Your information may be collected by us or an organisation we are working with (such as a partner organisation) and is shared with a local authority / public authority commissioner who is the data controller.
- 15.3. From you when you give it to us directly: You may provide your details when you ask us for information or make a donation, volunteer, attend our events contact us for any other reason. Your information may be collected by an organisation we are working with (such as a partner organisation).
- 15.4. When you give it to us indirectly: Your information may be shared with us by other organisations such as local authorities, public sector commissioners, other charities (or not for profit entities), family / parents / guardians who are seeking access for you to our services. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- 15.5. When you give it to us indirectly: Your information may be shared with us by other organisations such as fundraising sites like Just Giving if you are fundraising for us. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- 15.6. When you have given it to local authorities for whom the Charity is delivering commissioned services: Your information may be shared with us by local authorities where the Charity has been commissioned (directly or indirectly) to provide services on their behalf. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- 15.7. When you have given other organisations permission to share it: Your information may be provided to us by other organisations if you have given them your permission. This might for example be a charity working with us or might be when you buy a product or take a service from a third party organisation. The information we receive from other

organisations depends on your settings or the option responses you have given them.

- 15.8. When you use our website: When you use our website information about you is recorded and stored. See the information about the use of cookies under that heading below.
- 15.9. When it is available on social media: Depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

## **HOW WE USE YOUR INFORMATION**

16. We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:
  - 16.1. when necessary for carrying out your obligations under any contract between us,
  - 16.2. when necessary for carrying out obligations under any contract where we have been commissioned to deliver services on behalf of a local authority and/or public sector agency,
  - 16.3. providing you with the information or services you have asked for,
  - 16.4. to prove your identity and/or entitlement to use our services,
  - 16.5. working with trusted third party organisations who work in partnership with us to deliver the services you have requested,
  - 16.6. processing donations you make, including processing for Gift Aid purposes,
  - 16.7. organising volunteering activity you have told us you want to be involved in and in relation to the fundraising for us you are involved in,
  - 16.8. sending you communications with your consent that may be of interest including marketing information about our services and activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support,
  - 16.9. seeking your views on the services or activities we carry on so that we can make improvements,
  - 16.10. maintaining our organisational records and ensuring we know how you prefer to be contacted,
  - 16.11. analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness,
  - 16.12. processing grant or job applications,
  - 16.13. complying with our auditing requirements,
  - 16.14. enabling us to comply with our legal and regulatory obligations.

## **OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION**

17. The use of your information for the purposes set out above is lawful because one or more of the following applies:
  - 17.1. Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at [data.protection@oneymca.org](mailto:data.protection@oneymca.org). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.

172. It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.
  173. It is necessary to comply with our legal obligations in relation to the services that the Charity offers.
  174. Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.
  175. Where the purpose of our processing is necessary to protect the vital interests of the individual concerned or other individuals.
  176. Where processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the Charity by law or any commissioned service that is being delivered.
18. If you want to contact us about your marketing preferences, please contact [data.protection@oneymca.org](mailto:data.protection@oneymca.org) or write to the Data Protection Officer, One YMCA, Charter House, Charter Place, Watford, Hertfordshire WD17 2RT

#### **HOW WE KEEP YOUR INFORMATION SAFE**

19. We understand the importance of security of your personal information and take appropriate steps to safeguard it.
20. We always ensure only authorised persons have access to your information, which means only our staff, volunteers and contractors, and that everyone who has access is appropriately trained to manage your information.
21. No data transmission over the internet can however be guaranteed to be 100% secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

#### **WHO HAS ACCESS TO YOUR INFORMATION?**

22. Third parties - who provide services for us, for example, partner charities or organisations who are assisting the delivery of services. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.
23. Third parties - if we run an event in conjunction with them. We will let you know how your data is used when you register for any event.
24. Analytics and search engine providers that help us to improve our website and its use.

25. Third parties - in connection with restructuring or reorganisation of our operations, for example if we merge with another charity. In such event, we will take steps to ensure your privacy rights will be protected by the third party.
26. Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. This will occur if the Charity's suppliers are based outside the EEA. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a Data Processing Agreement which contains model EU clauses.
27. We may also disclose your personal information if we are required to do so under any legal obligation in relation to safeguarding individuals which is necessary and in the public interest.
28. We may be required by law to disclose your personal details in order to comply with applicable laws and lawful requests: this could include disclosing personal details to housing benefit offices, the police and local authorities etc.
29. We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention that is necessary and in the public interest.
30. Other than where there is a legal obligation to do so, we will not share your information with other organisations without your consent.

### CHILDREN'S INFORMATION

31. We appreciate that our supporters are of all ages. Where appropriate we will ask for consent from a parent or guardian to collect information about children (under 16s).
32. In respect of any youth work that is undertaken by the Charity, we will ask for consent from a parent or guardian for a child's participation in youth work activities.
33. Where you enrol for services in respect of your family and/or your children, the information requested will take into account what is needed to deliver the services that you request and any obligations placed on us by commissioned contracts from local authorities and/or public authorities. In many commissioned services, the Charity is acting on behalf of a local authority who remain as data controller in pursuance of their statutory obligation to facilitate service delivery.

### SAFEGUARDING

34. The Charity takes its obligations very seriously in respect of safeguarding matters. It will follow its legal and best practice duties required by safeguarding law to protect the interests of service users and/or the public in the spirit and objectives of the prevailing legislation.

## KEEPING YOUR INFORMATION UP TO DATE

35. We really appreciate it if you let us know if your contact details change. You can do so by contacting us at [data.protection@oneymca.org](mailto:data.protection@oneymca.org)

## OUR USE OF “COOKIES”

36. “Cookies” are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. They are stored on your hard drive to allow our website to recognise you when you visit. Please read our cookies policy at [www.oneymca.org/data](http://www.oneymca.org/data)

## HOW LONG WE KEEP YOUR INFORMATION FOR

37. We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes.  
Please see our Records Retention Policy at [www.oneymca.org/data](http://www.oneymca.org/data)
38. Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. We may periodically ask you to renew your consent.
39. If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## YOUR RIGHTS

40. You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing to [data.protection@oneymca.org](mailto:data.protection@oneymca.org) No charge will be levied unless one of the limited circumstances under Data Protection Legislation applies and this will be explained to you if relevant. To make a request contact us at:
- 40.1. By e-mail – [data.protection@oneymca.org](mailto:data.protection@oneymca.org)
- 40.2. By post – Data Protection Officer, One YMCA, Charter House, Charter Place, Watford, Hertfordshire WD17 2RT
41. You also have the following rights:
- 41.1. the right to request rectification of information that is inaccurate or out of date;
- 41.2. the right to erasure of your information (known as the “right to be forgotten”);
- 41.3. the right to restrict the way in which we are dealing with and using your information; and
- 41.4. the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”);
- 41.5. rights in relation to automated decision making and profiling including profiling for marketing purposes.
42. All of these rights are subject to certain safeguards and limits or exemptions. To exercise any of these rights, you should contact Data Protection Officer using the contact details set out above.





43. If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found at [www.ico.gov.uk](http://www.ico.gov.uk)

**CHANGES TO THIS PRIVACY POLICY**

44. This Policy may be changed from time to time. If we make any significant changes, we will advertise this on our website or contact you directly with the information.
45. Do please check this Policy each time you consider giving your personal information to us.